

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.
*individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

DECLARATION OF PAOLA M. BOYD

I, Paola M. Boyd, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am a resident of Henrico County, Virginia.
2. I formerly lived at the property located at 11000 Scattered Flock Court, Glen Allen, Virginia 23059, in Henrico County and the Richmond Division of the Eastern District of Virginia. This property was sold in a foreclosure sale conducted by the Defendants in the above-captioned case.
3. I am familiar with the details of my husband's case against the defendants and can offer testimony to support his claims, including our attempts to obtain a modification, the letters that we received from the Defendants, and the damages that we suffered when we ultimately lost our home.
4. I am currently employed in Richmond, Virginia. I work from 8:30-5, Monday through Friday.
5. It would be very difficult for me to get enough time off of work to travel to the Norfolk Division in order to offer testimony regarding this case. The federal courthouse in Norfolk is approximately two hours away from where I live, not including traffic. As I would have to drive through the Hampton Roads Bridge Tunnel to get to the courthouse, my actual travel time would probably be closer to two and a half or three hours.
6. I also have a daughter who is nine years old and attends school in Henrico County. If I had to travel to the Norfolk Division in order to litigate this case, I would have to find someone in the area to watch her while I was traveling to and from Norfolk.

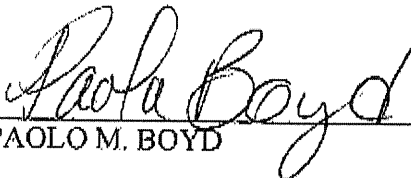


7. However, the federal courthouse in Richmond is approximately 20 minutes from my home. Because it is so close to where I live, it would be much easier to testify if this case were to remain in the Richmond Division.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: _____

1/25/13



PAOLO M. BOYD